

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>In Re:</b>	)	
	)	
<b>FAVOR OF GOD MINISTRIES, INC.,</b>	)	<b>Case No. 17-12472-M</b>
	)	<b>Chapter 7</b>
	)	
<b>Debtor.</b>	)	

**MOTION FOR TURNOVER AND  
NOTICE OF OPPORTUNITY FOR HEARING**

Karen Carden Walsh, Trustee of the above-captioned case, moves this Court for an Order requiring the Debtor, Favor of God Ministries, Inc. ("**Debtor**"), to turn over property of this Estate pursuant to 11 U.S.C. Section 542 and Bankruptcy Rule 7001. In support, the Trustee would show to the Court as follows:

1. The above-named Debtor filed this voluntary petition for relief under Chapter 7 of the U.S. Bankruptcy Code with this Court on December 19, 2017.
  2. Karen Carden Walsh is the duly appointed, qualified and acting Trustee of this Estate.
  3. The Trustee has requested that the Debtor turnover the following items to the Trustee:
    - a. Copies of the Debtor's bank statements and canceled checks for all accounts from December 2016 through December 2017, including the Debtor's scheduled account with Chase (XXXX5335) and with Bank of America (XXXX2656);
    - b. The Corporate minute book;
    - c. Copies of all financial statements for the Debtor for the year 2017;
- pursuant to 11 U.S.C. Section 542 (the "**Requested Items**").

4. The Trustee is unable to continue the administration of this case without the Requested Items. The Trustee seeks turnover of the Requested Items for the benefit of the Debtor and creditors.

5. Therefore, this Court should enter an Order requiring the Debtor to turnover the Requested Items.

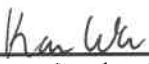
#### NOTICE OF OPPORTUNITY FOR HEARING

**Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document.** If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder, Tulsa, Oklahoma 74103, no later than fourteen (14) days from the date of filing of this request for relief. You should also mail a filed-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. **The fourteen (14) day period includes the 3 days allowed for mailing provided for in Rule 9006(f) Fed. R. Bankr. Proc.**

WHEREFORE, Trustee requests that the Court enter an Order compelling the above-named Debtor to turn over the Requested Items as set forth above.

Respectfully submitted August 27, 2018.

RIGGS, ABNEY, NEAL,  
TURPEN, ORBISON & LEWIS

  
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Karen Carden Walsh OBA No. 14690  
502 West 6<sup>th</sup> Street  
Tulsa, Oklahoma 74101  
918-587-3161  
Fax 918-587-9708

ATTORNEYS FOR TRUSTEE

**CERTIFICATE OF SERVICE**

I, Karen Carden Walsh, do hereby certify that on the 27 day of August, 2018, a filed copy of the above and foregoing instrument was electronically served upon all parties registered with CM/ECF, and that I mailed a true and correct copy of the above and foregoing instrument with postage being fully prepaid to:

Favor of God Ministries, Inc.  
c/o Austin Wilkerson  
11340 Tarrance Road  
Louisville, KY 40299

  
\_\_\_\_\_  
Karen Carden Walsh